

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JELENA LIU,

Plaintiff,

v.

No. 1:25-CV-00716-JPH-TAB

KRISTI NOEM, SECRETARY, U.S.
DEPARTMENT OF HOMELAND
SECURITY AND TODD M. LYONS,
ACTING DIRECTOR, U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendants.

CERTIFICATION OF ADMINISTRATIVE RECORD

I, Akil Baldwin, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am the Deputy Assistant Director for the National Security Division of Homeland Security Investigations. Prior to becoming the Deputy Assistant Director, I served as the Division Chief for the HSI Office of International Operations. I have additionally served as the HSI Attache in Hong Kong; Assistant Special Agent in Charge in New York, N.Y., and Assistant Attache in Brussels, Belgium.
2. The facts attested to herein are based upon my personal knowledge or upon information provided to me in my official capacity, including review of information obtained from various records, systems, databases, other Department of Homeland Security (DHS)

employees, and information portals maintained and relied upon by DHS in the regular course of business.

3. The documents listed in the accompanying Administrative Record Index and contained in the files annexed hereto, constitute to the best of my knowledge and belief, a true and complete copy of all non-privileged documents and materials considered by ICE regarding the termination of the Plaintiff's SEVIS record on April 3, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of April 2025.

**AKIL R
BALDWIN** Digitally signed by
AKIL R BALDWIN
Date: 2025.04.30
13:58:07 -04'00'

Akil Baldwin, Deputy Assistant Director
National Security Division
Homeland Security Investigations
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security